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5

6 **UNITED STATES BANKRUPTCY COURT**
7 **NORTHERN DISTRICT OF CALIFORNIA - OAKLAND DIVISION**

8 In re

9 HEATHER ANN RODEN,

10 Debtor.

Case No. 23-41423

Chapter 13

**SANTANDER BANK, N.A.'S REQUEST
FOR SPECIAL NOTICE**

11
12 **TO ALL INTERESTED PARTIES:**

13 **PLEASE TAKE NOTICE** that the firm of ALDRIDGE PITE, LLP, attorneys for Santander
14 Bank, N.A. hereby requests special notice of all events relevant to the above-referenced bankruptcy
15 and copies of all pleadings or documents filed in relation to the above-referenced bankruptcy,
16 including all pleadings or notices under Federal Rules of Bankruptcy Procedure, Rule 2002, the
17 commencement of any adversary proceedings, the filing of any requests for hearing, objections,
18 and/or notices of motion, or any other auxiliary filings, as well as notice of all matters which must be
19 noticed to creditors, creditors committees and parties-in-interest and other notices as required by the
20 United States Bankruptcy Code and Rules and/or Local Rules of the above-referenced bankruptcy
21 court.

22 ALDRIDGE PITE, LLP, requests that for all notice purposes and for inclusion in the Master
23 Mailing List in this case, the following address be used:

24 ALDRIDGE PITE, LLP
25 8880 Rio San Diego Drive, Suite 725
San Diego, CA 92108

26 Neither this Request for Special Notice nor any subsequent appearance, pleading, claim,
27 proof of claim, documents, suit, motion nor any other writing or conduct, shall constitute a waiver of
28

1 the within party's:

2 a. Right to have any and all final orders in any and all non-core matters entered only
3 after de novo review by a United States District Court Judge;

4 b. Right to receive service pursuant to Fed. R. Civ. P. 4 made applicable to the instant
5 proceeding by Fed. R. Bankr. P. 7004, notwithstanding Aldridge Pite, LLP's participation in the
6 instant proceeding. This Request for Special Notice shall not operate as a confession and/or
7 concession of jurisdiction. Moreover, the within party does not authorize Aldridge Pite, LLP, either
8 expressly or impliedly through Aldridge Pite, LLP's participation in the instant proceeding, to act as
9 its agent for purposes of service under Fed. R. Bankr. P. 7004;

10 c. Right to trial by jury in any proceeding as to any and all matters so triable herein,
11 whether or not the same be designated legal or private rights, or in any case, controversy or
12 proceeding related hereto, notwithstanding the designation or not of such matters as "core
13 proceedings" pursuant to 28 U.S.C. § 157(b)(2)(H), and whether such jury trial right is pursuant to
14 statute or the United States Constitution;

15 d. Right to have the reference of this matter withdrawn by the United States District
16 Court in any matter or proceeding subject to mandatory or discretionary withdrawal; and

17 e. Other rights, claims, actions, defenses, setoffs, recoupments or other matters to which
18 this party is entitled under any agreements at law or in equity or under the United States Constitution.

19 ALDRIDGE PITE, LLP

20
21 Dated: December 27, 2023

/s/ Wendy Locke

Attorneys for Santander Bank, N.A.

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that I caused a copy of the foregoing **REQUEST FOR SPECIAL NOTICE**
3 to be served on December 29, 2023. Service was accomplished by the method and to the following
4 as indicated:

5 BY ELECTRONIC NOTICE OR FIRST CLASS MAIL

6 **DEBTOR**
7 **(via U.S. Mail)**

8 Heather Ann Roden
9 16116 Paseo Largavista
San Lorenzo, CA 94580

10 **TRUSTEE**
11 **(via electronic notice)**

12 Martha G. Bronitsky
13 P.O. Box 5004
Hayward, CA 94540
13trustee@oak13.com

14 I declare under penalty of perjury that the foregoing is true and correct.

15 Dated: December 29, 2023

/s/ Melissa Gonzalez
Melissa Gonzalez